

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

JEAN D. NSABUMUREMYI

*Plaintiff*

VS.

C.A. No.

UNIVERSITY OF RHODE ISLAND, by

and through its Board Chair, in her

Official Capacity, Margo L. Cook

*Defendant*

**PETITION FOR REMOVAL**

Now comes Defendant, University of Rhode Island, by and through its Board Chair, in her Official Capacity, Margo L. Cook and hereby files this Petition for Removal for the purpose of removing this matter from Washington County Superior Court to the United States District Court for the District of Rhode Island. Defendant hereby states as follows:

1. State Court Action. Plaintiff, Jean D. Nsabumuremyi initiated this civil action in the Washington County Superior Court on or about February 19, 2025.

2. Federal Jurisdiction. As set forth in the Complaint, Plaintiff alleges that Defendant has unlawfully discriminated against him based on his race in violation of Title VII, and that Defendant has retaliated against Plaintiff for his complaints of discrimination based on his race, color and national origin also in violation of Title VII. Accordingly, this Court has original jurisdiction over this matter based upon a federal question pursuant to 28 U.S.C. § 1331, and the above-referenced civil action is one that may be removed pursuant to 28 U.S.C. § 1441(a).

3. Timeliness of Removal Petition. This action was filed on or about February 19, 2025 and a copy of the complaint and summons was served upon Defendant on or about April 16, 2025. Removal of this action is therefore timely under 28 U.S.C. § 1446(b).

4. Relief Requested. Defendant respectfully requests that the United States District Court for the District of Rhode Island accept this Petition for Removal and that it assumes jurisdiction of this cause and issue such further orders and processes as may be necessary to bring before it all parties necessary for the trial hereof.

Defendant,  
University of Rhode Island,  
by and through its Board Chair, in her official  
capacity only, Margo L. Cook,  
By its Attorneys,

/s/ Matthew T. Oliverio  
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Dated: April 23, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically with the United States District Court for the District of Rhode Island on the 23<sup>rd</sup> day of April 2025 and is available for viewing and downloading from the Electronic Case Filing system. A copy of the foregoing will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by mail to those indicated as nonregistered participants.

/s/ Matthew T. Oliverio